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Attorneys for Defendant NETFLIX, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

LAURI VALJAKKA,

Plaintiff,

v.

NETFLIX, INC.,

Defendant.

**Case No. 4:22-cv-01490-JST**

**DEFENDANT NETFLIX, INC.'S  
UNOPPOSED MOTION TO REMOVE  
INCORRECTLY FILED DOCUMENTS:  
DOCKET NO. 100 AND ATTACHMENT  
NO. 1 (EXHIBIT A)**

Netflix, Inc. (“Netflix”) hereby moves to remove the following documents from ECF, filed on June 16, 2022 at 6:12 pm PST, as Docket No. 100 in Case No. 4:22-cv-01490-JST:

- Netflix’s Motion to Amend/Correct Supplemental Responsive Damages Contentions (Unopposed)
- Attachments: #1 Exhibit A
- Attachments: #2 Proposed Order

Due to administrative error, incorrect documents were uploaded and filed via ECF. Attachment #1, Exhibit A contains highly confidential information, and Netflix urgently and respectfully requests removal as soon as possible.

After discovering the error early Saturday morning, Netflix immediately: (1) notified opposing counsel (who have confirmed they have not and will not access the document); (2) emailed and left a voicemail with the assigned docket clerk to have it removed, and left a voicemail with the ECF HelpDesk; (3) reached out in multiple ways to the General Counsel of PACER in attempt to have it removed. To avoid drawing any further public attention to the incorrect filing, which we understand could not be removed before the Court opened on June 20, 2023, Netflix waited to file this Motion until Tuesday June 20, 2023, after confirming with the Court’s Docketing staff that the inadvertently filed document would be locked immediately.

A corrected Motion for Leave to Supplement its Responsive Damages Contentions, Exhibit A, and proposed order will be filed on June 20, 2023, and should be deemed to supersede the documents incorrectly filed as Docket No. 100.

Counsel for Netflix met and conferred by email with counsel for Plaintiff on June 17, 2023, who confirmed that Plaintiff does not oppose this motion.

For the foregoing reason, Netflix respectfully requests that the Court grant Netflix’s Motion to Remove Incorrectly Filed Documents: Docket No. 100 (including Exhibit A).

1 Dated: June 20, 2023

**PERKINS COIE LLP**

3 By: /s/ Elise Edlin

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